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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**IN RE: DEBORAH and ROBERT BITLER**

**CASE NO.: 15-22801 ABA**

**DEBTORS**

**CHAPTER: 13**

**HEARING DATE: 11/14/17**

**CERTIFICATION OF THE DEBTOR DEBORAH BITLER IN OPPOSITION TO  
TRUSTEE'S MOTION**

**Deborah Bitler, of full age, certifies and says:**

1. I am the debtor in this case, along with my husband Robert, and make this certification in opposition to the Trustee's motion to compel us to file a modified Chapter 13 Plan that includes substantial dividends to our unsecured creditors.
2. For a few years now my husband and I have been caring for foster children as placed by the New Jersey Division of Child Protection and Permanency.
3. At the time of our bankruptcy filing, July 8, 2015, we had three foster children in addition to our now 8 year old son.
4. We subsequently adopted two of our foster children, These adoptions are subsidized adoptions, for which we receive a monthly stipend from the Division. These children are a boy, now 3 and a girl now 8 years old.
5. I would note that the stipend paid by the state, both for our two adopted children and for foster children, is about \$750.00 per month (depending on how many days are in a particular month) per child plus a separate monthly clothing allowance of \$.42 per day per child.
6. At present we have three foster children in our home. We have agreed with the Division that we will adopt one of the three foster children, a 2 year old girl. With this adoption our family will be complete.

7. As far as the other 2 foster children, a 1 year old and an 8 month old baby, the Division is in the process of terminating parental rights and finding adoptive homes for them. I did not expect that these two children would be with as long as they have been.
8. My case worker advises that one of the children is expected to be placed in another home on or about December 1, 2017. Placement of the other child should be done soon after that.
9. As I noted earlier, at the time of our filing we had three children in our home for whom we received stipends from the Division. The difference in income between then and now is the stipends we receive for other two children, the two who will not remain with us. This jump in income is temporary.
10. I am 45 years old, and am caring for two 8 year old children a three year old, a one year old and a baby. I would note that I have three older children also. I have discussed with my case worker a number of times that the two younger children, those who are going to adoptive homes and who will definitely not be staying with us should be placed as soon as possible. She advises that the Division is moving as quickly as possible. If we are forced to pay a substantial dividend to our unsecured creditors out of this temporary increase in our stipend I will have to advise the Division that the children will have to be moved immediately.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false I am subject to punishment.

October 30, 2017

/s/ Deborah L. Bitler

Deborah L. Bitler

September 1, 2017

RE: Deborah Bitler  
408 Manor Avenue  
Oaklyn, New Jersey 08107  
Chapter 13 case number: 15-22801  
Loan number: xxxx5142

Sir/Madam:

I represent Ms Bitler with regard to the petition filed pursuant to Chapter 13 of the Bankruptcy Code. It is my understanding that my client wishes to apply for a modification of the terms of her first mortgage, presently serviced by Nationstar or, in the alternative, secure a new mortgage loan. By this letter I consent to any employee, agent or representative of any firm engaged in the business of mortgage loan modification or origination to speak or write to Ms Bitler directly. It is understood that this authorization does not permit communication with my clients on any other issue.

If you have any questions please call. Thank you.

Very truly yours,

David H. James

DHJ/rmc  
Copy: Ms Bitler